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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JANE DOE, an individual,

Plaintiff,

vs.

JACK JUAN, an individual; DOES I  
through X; ROE corporations I through X,  
inclusive.

Defendants.

Case No.: 2:25-cv-00120-GMN-NJK

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO SUBMIT  
MOTION FOR ATTORNEY'S  
FEES AND COSTS**

**(FIRST REQUEST)**

Plaintiff Jane Doe a/k/a Jacqueline Nichols and Defendant Jack Juan (collectively,  
the "Parties") hereby agree and stipulate as follows:

1. On April 8, 2025, this Court issued an order granting Plaintiff's Motion to Remand. (ECF No. 31.)
2. Pursuant to this Order, Plaintiff was given until May 5, 2025, to file a motion for attorney's fees.
3. Good cause exists for a brief extension of this deadline. Specifically, shortly after the Court issued its order, Mr. Wolpert was required to travel to visit his elderly mother for the Jewish holiday of Passover. Furthermore, Ms. McLetchie and Mr. Wolpert were travelling internationally between April 27, 2025, and May 4, 2025, with limited ability to perform legal work. Additionally, Ms. McLetchie is scheduled for oral argument before the Nevada Supreme Court in Carson City on May 7, 2025, in Case No. 89347, necessitating both travel and preparation.

4. Plaintiff therefore requires four (4) extra days, until **May 9, 2025**, to adequately brief and submit a motion for attorney's fees and costs in this matter.

5. Defendant's counsel has consented to this brief extension, and their professional courtesy is appreciated. To that end, the Parties stipulate that the briefing schedule for Defendant's response and Plaintiff's reply shall also be extended four (4) days.

6. By entering into this Stipulation and Order, Mr. Juan explicitly and unequivocally waives any and all arguments and defenses with regard to the timeliness of the briefing on a motion for attorney's fees and costs if the fees motion is submitted on or before **May 9, 2025**.

7. Mr. Juan does not waive, but retains the right to assert, all other arguments or defenses, whatsoever, pertaining to any motion for attorney's fees and costs.

8. This stipulation is being entered into in good faith and not for the purposes of delay, but rather to ensure effective representation for Ms. Nichols. This is the first request for an extension of the instant deadline.

**IT IS SO STIPULATED.**

**MCLEATCHIE LAW**

**LEWIS BRISBOIS BISGAARD & SMITH  
LLP**

DATED May 5, 2025

DATED May 5, 2025

By: /s/ Leo S. Wolpert  
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By: /s/ Philip J. Tacason  
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*Attorneys for Plaintiff JACQUELINE  
NICHOLS*

*Attorneys for Defendant JACK JUAN*

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**ORDER**

Plaintiff shall have until **May 9, 2025**, to submit a motion for attorney's fees and costs. Defendant shall have until **May 23, 2025**, to submit a response to the fees motion. Plaintiff shall have until **May 30, 2025**, to submit a reply in support of her fees motion.

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

DATED: May 6, 2025